

# EXHIBIT 1

**CAUSE NO. 2022-CI-11011**

**IVAN SMITH**  
*Plaintiff,*

**V.**

**UBER TECHNOLOGIES, INC.;  
PORTIER, LLC; RASIER, LLC;  
CARLA REYES TREVINO; JOSHUA  
ALDANA; RUBEN MALDONADO JR.  
and ALBERT ANGEL REYES TREVINO**  
*Defendants.*

**IN THE DISTRICT COURT**

## 57<sup>TH</sup> JUDICIAL DISTRICT

**BEXAR COUNTY, TEXAS**

**PLAINTIFF'S FIFTH SET OF REQUESTS FOR PRODUCTION TO UBER  
TECHNOLOGIES INC.**

**TO: DEFENDANT UBER TECHNOLOGIES, INC.** (“Defendant”), through attorneys of record, Katherine Bell-Moss, Angela Angotti, and Paige Cheung, BOWMAN AND BROOKE LLP, 2901 Via Fortuna Dr., Ste. 500, Austin, Texas 78746.

Plaintiff Ivan Smith serves these Requests for Production on Defendant Uber Technologies, Inc., as allowed by Texas Rule of Civil Procedure 196. Uber Technologies, Inc., must respond to each request separately, fully, in writing, and within 30 days after service.

Pursuant to Texas Rule of Civil Procedure 193.5, these Requests are continuing in nature and require supplementation reasonably promptly after the responding party discovers the necessity for such a response.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served on all Defendants' Counsel of Record on this **17<sup>th</sup> Day of April via** electronic service.

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**Attorneys For Defendant Albert Angel Reyes  
Trevino**

/s/ Bret Stanley

64. All photographs, surveillance, video recordings, and/or audio recordings that captured any part of the Subject Incident or Subject delivery.
65. Documents reflecting the time, date, and contents of all User Interactions by Joshua Aldana ([REDACTED]) related to the Subject Incident. (This includes but is not limited to delivery acceptance, trip started, trip ended, any in-app messaging, responses to Telematic Triggers, and any other inputs).
66. All Documents provided to Law Enforcement that relate to the Subject Incident in Uber's possession.
67. All e-mails, Exact Target Messages, Zendesk messages, Bliss Messages, text messages and/or any type of electronic message sent to the Driver from January 1, 2022 to Present.
68. All Materials reflecting Uber's Investigation of the Subject Incident, including the complete, up-to-date Ticket and Ticket-Related Documents.
69. All exhibits, documents, or data intended by Uber to be used at Trial in this matter.

[REDACTED]

70. Produce documents that indicate Uber's system flagged Joshua Aldana (UUID [REDACTED]) as making [REDACTED] deliveries.

71.

**WITHDRAWN**